

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. VICTOR MANUEL VALLE-LASSALLE, a/k/a "Manolo,"
(Counts One, Two, Three, Four, Five, Six, Ten and Twelve)
2. JOSE RODRIGUEZ-MARRERO, a/k/a "Zurdo,"
(Counts One, Four and Five)
3. NICHOLAS PEÑA-GONZALEZ, a/k/a "Nicky,"
(Count One, Two and Three)
4. OMAR F. GENAO-SANCHEZ, a/k/a "Omi,"
(Counts One, Two, Three and Twelve)
5. Not Charged Herein,
6. Not Charged Herein,
7. Not Charged Herein,
8. Not Charged Herein,
9. Not Charged Herein,
10. Not Charged Herein,
11. LUIS ROLDAN-CORTES, a/k/a "Wisi,"
(Counts One, Seven, Eight and Nine),
12. ANIBAL PAGAN-CEREZO, a/k/a "El Cojo,"
(Counts One, Seven, Eight and Nine),
13. MARCOS MATTEI-GARCIA,
(Count One and Twelve),
14. RAMON GARCIA CHERENA, a/k/a "Maya,"
(Count One and Twelve)
15. ROLANDO PEREZ, a/k/a "Titi,"
(Count One and Twelve)
16. JOSEPH CAPELLA-QUIÑONES, a/k/a "Joe,"
(Count One)

***SECOND
SUPERSEDING
INDICTMENT***

Criminal No. 97-284 (JAF)

Violations:

Title 21, United States Code:

*Sections 846, 848(e)(1) and 841(a)(1)
(conspiracy to possess and possession
of narcotics with the intent to
distribute and murder during and in
relation to a drug trafficking offense)*

Title 18, United States Code:

*Section 924(j) and (o)
(firearm killing in relation to a drug
trafficking offense and conspiracy
to commit a firearms murder)*

*Section 1512(a)
(killing of a government
witness or informant)*

*Section 1512(b)
(tampering with a witness)*

*Section 373
(solicitation of a crime of violence)*

*Section 4
(misprision of a felony)*

*Section 2
(aiding and abetting)*

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Second Superseding IndictmentU.S. v. Victor Manuel Valle-Lassalle, et al.

Page 2

17. PEDRO GOMEZ-VERA,

a/k/a "Papun,"

(Count One),

18. SASHA GONZALEZ-SOSA,

(Counts One, Ten and Eleven)

(TWELVE COUNTS)

Defendants.

THE GRAND JURY CHARGES:

COUNT ONE*Title 21, U.S.C., Section 846***DRUG TRAFFICKING CONSPIRACY**

Beginning on a date unknown, but no later than in or about the latter part of 1992, and ending on a date unknown, but no earlier than in or about early 1998, in the District of Puerto Rico and elsewhere and within the jurisdiction of the Court,

1. **VICTOR MANUEL VALLE LASSALLE, a/k/a "Manolo,"**
2. **JOSE RODRIGUEZ MARRERO, a/k/a "Zurdo,"**
3. **NICHOLAS PEÑA GONZALEZ, a/k/a "Nicky,"**
4. **OMAR F. GENAO-SANCHEZ, a/k/a "Omi,"**
11. **LUIS ROLDAN-CORTES, a/k/a "Wisi,"**
12. **ANIBAL PAGAN-CEREZO, a/k/a "El Cojo,"**
13. **MARCOS MATTEI-GARCIA,**
14. **RAMON GARCIA CHERENA, a/k/a "Maya,"**
15. **ROLANDO PEREZ, a/k/a "Titi,"**
16. **JOSEPH CAPELLA-QUIÑONES, a/k/a "Joe,"**
17. **PEDRO GOMEZ-VERA, a/k/a "Papun,"**
18. **SASHA GONZALEZ-SOSA,**

the defendants herein, did knowingly, willfully, unlawfully, and intentionally combine, conspire, confederate and agree with each other and divers other persons to the grand jury known and unknown, including the following persons not charged herein, James Martin-Rodriguez, a/k/a "Kiri," (deceased), Carlos Roberto Rodriguez-Torres, a/k/a "Robert Caballo," (deceased), Edward

Second Superseding IndictmentU.S. v. Victor Manuel Valle-Lassalle, et al.

Page 3

Llaurador-Rodriguez (deceased), Jose Hernandez-Jimenez, a/k/a "Chelo" (deceased), Heriberto Nieves-Alonzo, a/k/a "Jun," Henry Pamias-Burgos, a/k/a "Moncho Orejas," Patricio Perez-Vega, Arizmendi Velez, Luis Angel Lopez-Lorenzo, a/k/a "Millo," Raul Santodomingo Romero, David Ramos Rivera, a/k/a "Pecas," Angela Ayala-Martinez, Javier Soto-Alarcon, a/k/a "Chester," Walter Irizarry-Ruiz, Alba Quiñonez-Gonzalez, Tomasita Lassalle-Rodriguez, and Anayda Valle-Lassalle, to commit offenses against the United States, to wit, to knowingly, intentionally, willfully, and unlawfully possess with the intent to distribute multi-kilogram quantities of cocaine, a Schedule II narcotic drug controlled substance, in excess of five (5) kilograms and multi-hundred pound quantities of marijuana, a Schedule I controlled substance, that is conspiracy to violate Title 21, United States Code, Section 841(a)(1); all in violation of Title 21, United States Code, Section 846.

A. OBJECTS OF THE CONSPIRACY

1. It was an object of the conspiracy to retrieve large shipments of cocaine and marijuana off the coast of Puerto Rico to be smuggled into Puerto Rico for distribution to other drug traffickers, including distribution at different drug points ("*puntos*") in Aguadilla, Yauco, and elsewhere.
2. It was a further object of the conspiracy to generate and obtain significant monetary profits in the form of illegal drug proceeds from the retrieval and distribution of narcotics as described in paragraph 1, above.

B. MANNER AND MEANS TO ACCOMPLISH THE CONSPIRACY

The manner and means by which the defendants and co-conspirators would further and accomplish the objects of the conspiracy included, among others, the following:

Second Superseding IndictmentU.S. v. Victor Manuel Valle-Lassalle, et al.

Page 4

1. It was part of the conspiracy that the defendants and their co-conspirators would organize and/or assist in the smuggling of multi-kilogram quantities of cocaine and/or marijuana into Puerto Rico.

2. It was a further part of the conspiracy that the defendants and their co-conspirators would purchase and sell cocaine and marijuana, including the distribution of the narcotics at various drug points ("*puntos*") in Aguadilla, Yauco, and elsewhere.

3. It was a further part of the conspiracy that the defendants and their co-conspirators would have different roles and would perform different tasks in furtherance of the conspiracy.

4. It was a further part of the conspiracy that the defendants and their co-conspirators would possess and carry firearms for their personal protection and to protect narcotics and drug proceeds, and to commit crimes of violence, including murder.

5. It was a further part of the conspiracy that the defendants and their co-conspirators would use violence, including murder, in order to maintain order within the organization and to retaliate against those who were viewed as having betrayed the drug trafficking organization, including those persons who were believed to be cooperating ("*choteando*") with the police and/or federal law enforcement authorities.

6. It was a further part of the conspiracy that the drug trafficking organization would receive information from law enforcement officials, including police officers, in order to assist the drug trafficking organization.

Second Superseding IndictmentU.S. v. Victor Manuel Valle-Lassalle, et al.

Page 5

7. It was a further part of the conspiracy that members of the drug trafficking organization would own or possess boats to be used in the smuggling of drug shipments.

8. It was a further part of the conspiracy that members of the conspiracy would store large shipments of narcotics on different properties ("stash houses") owned or used by them.

C. OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

The defendants did commit, among others, in the District of Puerto Rico, the following overt acts in furtherance of the objects and aims of the conspiracy.

1. In or about the fall of 1992, [1] VICTOR MANUEL VALLE-LASSALLE, a/k/a "Manolo," [11] LUIS ROLDAN-CORTES, a/k/a "Wisi," Raul Santodomingo Romero, James Martin Rodriguez, a/k/a "Kiri" (deceased) and others met at the Isabela farm of Raul Santodomingo Romero and discussed the fact that they had successfully smuggled a shipment of narcotics into Puerto Rico.

2. On or about May 6, 1993, [1] VICTOR MANUEL VALLE-LASSALLE, a/k/a "Manolo," purchased a farm in Moca, Puerto Rico, for approximately seventy thousand dollars (\$70,000) in drug proceeds and registered the property in the name of his mother, Tomasita Lassalle-Rodriguez.

3. On or about May 20, 1993, [1] VICTOR MANUEL VALLE-LASSALLE, a/k/a "Manolo," [11] LUIS ROLDAN CORTES, a/k/a "Wisi," [12] ANIBAL PAGAN-CEREZO, a/k/a "El Cojo," Raul Santodomingo Romero, and David Ramos-Rivera, a/k/a "Pecas," while aiding

Second Superseding IndictmentU.S. v. Victor Manuel Valle-Lassalle, et al.

Page 6

and abetting each other, killed James Martin-Rodriguez, a/k/a "Kiri" (deceased), because they suspected that he was cooperating with law enforcement authorities..

4. On or about June 1, 1993, **[1] VICTOR MANUEL VALLE-LASSALLE, a/k/a "Manolo,"** Raul Santodomingo Romero, and others attempted to smuggle approximately two hundred and eighty (280) kilograms of cocaine into Puerto Rico in the area of Aguadilla.

5. In or about the summer of 1993, **[1] VICTOR MANUEL VALLE-LASSALLE, a/k/a "Manolo," [17] PEDRO GOMEZ-VERA, a/k/a "Papun,"** David Ramos Rivera, a/k/a "Pecas," and other persons participated in the smuggling of a shipment of marijuana into Puerto Rico, through Ponce, on behalf of Raul Santodomingo Romero which was stored at **[1] VALLE-LASSALLE's** farm in Moca and also at a "stash" house in San Sebastian, Puerto Rico.

6. In or about the spring of 1994, **[1] VICTOR MANUEL VALLE-LASSALLE, a/k/a "Manolo,"** Raul Santodomingo Romero, David Ramos Rivera, a/k/a "Pecas," Javier Soto-Alarcon, a/k/a "Chester," and others participated in the smuggling of a multi-hundred kilogram shipment of cocaine through the area of Guanica, Puerto Rico, which was stored in a van at **VALLE-LASSALLE's** farm in Moca.

7. In or about the fall of 1994, **[1] VICTOR MANUEL VALLE-LASSALLE, a/k/a "Manolo," [3] NICHOLAS PEÑA-GONZALEZ, a/k/a "Nicky," [13] MARCOS MATTEI GARCIA, [11] LUIS ROLDAN CORTES, a/k/a "Wisi,"** David Ramos Rivera, a/k/a "Pecas," Carlos Roberto Rodriguez-Torres, a/k/a "Robert Caballo" (deceased), Heriberto Nieves-Alonzo,

Second Superseding IndictmentU.S. v. Victor Manuel Valle-Lassalle, et al.

Page 7

a/k/a "Jun," and others traveled from Puerto Rico to the Dominican Republic in order to coordinate the smuggling of a drug shipment into Puerto Rico.

8. In or about late 1994, [1] **VICTOR MANUEL VALLE-LASSALLE**, a/k/a "Manolo," [11] **LUIS ROLDAN-CORTES**, a/k/a "Wisi," [13] **MARCOS MATTEI-GARCIA**, [14] **RAMON GARCIA-CHERENA**, a/k/a "Maya," [16] **JOSEPH CAPELLA-QUIÑONES**, a/k/a "Joe," [17] **PEDRO GOMEZ-VERA**, a/k/a "Papun," David Ramos Rivera, a/k/a "Pecas," Raul Santodomingo Romero, Carlos Roberto Rodriguez-Torres, a/k/a "Robert Caballo" (deceased), and others participated in the smuggling of a multi-hundred kilogram shipment of cocaine through Pastillo, Isabela, Puerto Rico, which was stored in a van at [1] **VALLE-LASSALLE's** farm in Moca.

9. On or about June 27, 1995, [3] **NICHOLAS PEÑA GONZALEZ**, a/k/a "Nicky," possessed with the intent to distribute cocaine at the drug point operated by [1] **VICTOR MANUEL VALLE-LASSALLE**, a/k/a "Manolo," in the Juan Garcia Ducos Public Housing Project in Aguadilla, Puerto Rico.

10. In or about November of 1995, [1] **VICTOR MANUEL VALLE-LASSALLE**, a/k/a "Manolo," [4] **OMAR F. GENAO-SANCHEZ**, a/k/a "Omi," [13] **MARCOS MATTEI-GARCIA**, [15] **ROLANDO PEREZ**, a/k/a "Titi," David Ramos-Rivera, a/k/a "Pecas," Carlos Roberto Rodriguez-Torres, a/k/a "Robert Caballo" (deceased), Edward Llaurador-Rodriguez (deceased), Henry Pamias-Burgos, a/k/a "Moncho Orejas," and others participated in the smuggling of a shipment of cocaine in the area of Guanica, Puerto Rico, on behalf of Angela Ayala-Martinez.

Second Superseding IndictmentU.S. v. Victor Manuel Valle-Lassalle, et al.

Page 8

11. In or about February of 1996, in the area of Guanica, Puerto Rico, [1] **VICTOR MANUEL VALLE-LASSALLE**, a/k/a "Manolo," [4] **OMAR F. GENAO-SANCHEZ**, a/k/a "Omi," [13] **MARCOS MATTEI-GARCIA**, [14] **RAMON GARCIA-CHERENA**, a/k/a "Maya," [15] **ROLANDO PEREZ**, a/k/a "Titi," Walter Irizarry-Ruiz, Carlos Roberto Rodriguez-Torres, a/k/a "Robert Caballo" (deceased), David Ramos-Rivera, a/k/a "Pecas," and others participated in the smuggling of a shipment of cocaine, from which [1] **VALLE-LASSALLE**, [13] **MATTEI-GARCIA**, [14] **GARCIA-CHERENA**, Irizarry-Ruiz and Ramos-Rivera stole approximately thirty (30) kilograms of cocaine from the owners of the drug shipment.

12. On or about March 13, 1996, [1] **VICTOR MANUEL VALLE-LASSALLE**, a/k/a "Manolo," purchased a residence in Aguada, Puerto Rico, with approximately ninety-seven thousand dollars (\$97,000) in drug proceeds and registered the property in the name of his sister, Anayda Valle-Lassalle.

13. In or about late May and early June of 1996, [1] **VICTOR MANUEL VALLE-LASSALLE**, a/k/a "Manolo," [3] **NICHOLAS PEÑA GONZALEZ**, a/k/a "Nicky," [4] **OMAR F. GENAO-SANCHEZ**, a/k/a "Omi," [16] **JOSEPH CAPELLA-QUIÑONES**, Javier Soto-Alarcon, a/k/a "Chester," Heriberto Nieves-Alonzo, a/k/a "Jun," Carlos Roberto Rodriguez-Torres, a/k/a "Robert Caballo" (deceased), and others participated in an attempt to smuggle a shipment of marijuana into Puerto Rico's southern coast but, due to logistical problems, the marijuana was not picked up.

Second Superseding IndictmentU.S. v. Victor Manuel Valle-Lassalle, et al.

Page 9

14. In or about July of 1996, [1] **VICTOR MANUEL VALLE-LASSALLE, a/k/a "Manolo,"** ordered the murder of Carlos Roberto Rodriguez-Torres, a/k/a "Roberto Caballo" (deceased), in order to maintain secret the February, 1996, theft of the cocaine described in paragraph 11, above, and recruited [3] **NICHOLAS PEÑA-GONZALEZ, a/k/a "Nicky,"** and [4] **OMAR F. GENAO SANCHEZ, a/k/a "Omi,"** to commit that murder.

15. On or about July 15, 1996, acting upon instructions of [1] **VICTOR MANUEL VALLE-LASSALLE, a/k/a "Manolo,"** [3] **NICHOLAS PEÑA-GONZALEZ, a/k/a "Nicky,"** with the assistance of [4] **OMAR F. GENAO SANCHEZ, a/k/a "Omi,"** (and in the presence of Edward Llaurador-Rodriguez (deceased)) shot and killed Carlos Roberto Rodriguez-Torres, a/k/a "Roberto Caballo."

16. On or about October 4, 1996, in Aguadilla, Puerto Rico, [1] **VICTOR MANUEL VALLE-LASSALLE, a/k/a "Manolo,"** possessed a Smith & Wesson revolver.

17. On or about October 11, 1996, in the area of Playa Santa/Guanica, Puerto Rico [1] **VICTOR MANUEL VALLE-LASSALLE, a/k/a "Manolo,"** met with [13] **MARCOS MATTEI-GARCIA,** Henry Pamias-Burgos, a/k/a "Moncho Orejas," and other persons and discussed the fact that Edward Llaurador-Rodriguez was cooperating with authorities and had to be killed.

18. On or about October 13, 1996, [1] **VICTOR MANUEL VALLE-LASSALLE, a/k/a "Manolo,"** recruited [2] **JOSE RODRIGUEZ-MARRERO, a/k/a "Zurdo,"** Heriberto Nieves-Alonso, a/k/a "Jun," Jose Hernandez-Jimenez, a/k/a "Chelo" (deceased), Javier Soto-Alarcon, a/k/a "Chester," Patricio Perez-Vega, and Henry Pamias Burgos, a/k/a "Moncho Orejas," in order to kill

Second Superseding IndictmentU.S. v. Victor Manuel Valle-Lassalle, et al.

Page 10

Edward Llaurador-Rodriguez, who was cooperating with the police and was a witness against [1]

VALLE-LASSALLE, [3] PEÑA-GONZALEZ, and [4] GENAO-SANCHEZ with respect to the murder of Carlos Roberto Rodriguez-Torres, a/k/a "Robert Caballo" (deceased).

19. On or about the evening of October 13, 1996, [1] **VICTOR MANUEL VALLE-LASSALLE**, a/k/a "Manolo," supervised and ordered the murder (by decapitation with a machete) of Edward Llaurador-Rodriguez by [2] **JOSE RODRIGUEZ-MARRERO**, a/k/a "Zurdo," who was assisted by Jose Hernandez-Jimenez, a/k/a "Chelo" (deceased), Heriberto Nieves-Alonzo, a/k/a "Jun," and Javier Soto-Alarcon, a/k/a "Chester."

20. On or about the early morning of October 14, 1996, Heriberto Nieves-Alonzo, a/k/a "Jun," transported Jose Hernandez-Jimenez, a/k/a "Chelo" (deceased) to a hospital in Aguadilla, Puerto Rico, where Hernandez-Jimenez received treatment for a stab wound inflicted by Edward Llaurador-Rodriguez (deceased).

21. On or about the morning of October 14, 1996, [1] **VICTOR MANUEL VALLE-LASSALLE**, a/k/a "Manolo," and Alba Quiñonez-Gonzalez took [2] **JOSE RODRIGUEZ-MARRERO**, a/k/a "Zurdo," to a doctor in Aguadilla, Puerto Rico, where [2] **RODRIGUEZ-MARRERO** received treatment for a stab wound inflicted by Edward Llaurador-Rodriguez (deceased).

22. In or about May of 1997, [1] **VICTOR MANUEL VALLE-LASSALLE**, a/k/a "Manolo," [2] **JOSE RODRIGUEZ-MARRERO**, a/k/a "Zurdo," Jose Hernandez-Jimenez, a/k/a "Chelo" (deceased), and Javier Soto Alarcon, a/k/a "Chester," went to the residence of Angela

Second Superseding IndictmentU.S. v. Victor Manuel Valle-Lassalle, et al.

Page 11

Ayala-Martinez in Ponce, Puerto Rico, where [1] **VICTOR MANUEL VALLE-LASSALLE**, a/k/a "Manolo," negotiated with Ayala-Martinez the smuggling of a shipment of cocaine into Puerto Rico.

23. In or about the summer of 1997, [1] **VICTOR MANUEL VALLE-LASSALLE**, a/k/a "Manolo," [2] **JOSE RODRIGUEZ-MARRERO**, a/k/a "Zurdo, Luis Angel Lopez-Lorenzo, a/k/a "Millo," and David Ramos-Rivera, a/k/a "Pecas," met in order to discuss the bringing in of a shipment of cocaine on behalf of Raul Rivera-Perez, a/k/a "Macho."

24. On or about September 5, 1997, [1] **VICTOR MANUEL VALLE-LASSALLE**, a/k/a "Manolo," possessed, at the residence of [18] **SASHA GONZALEZ-SOSA**, a Browning .380 caliber pistol.

25. In or about the fall of 1997, [17] **PEDRO GOMEZ-VERA**, a/k/a "Papun," advised members of the [1] **VALLE-LASSALLE** organization that [3] **NICHOLAS PEÑA GONZALEZ**, a/k/a "Nicky," was allegedly cooperating with law enforcement authorities.

26. In or about December of 1997, [1] **VICTOR MANUEL VALLE-LASSALLE**, a/k/a "Manolo," and Luis Angel Lopez-Lorenzo, a/k/a "Millo," communicated with Javier Soto-Alarcon, a/k/a "Chester," in order to convince Soto-Alarcon to testify falsely on behalf of [1] **VALLE-LASSALLE** and others.

27. In or about January of 1998, [1] **VICTOR MANUEL VALLE-LASSALLE**, a/k/a "Manolo," directly and with the assistance of [18] **SASHA GONZALEZ-SOSA** communicated with David Ramos-Rivera, a/k/a "Pecas," in order for Ramos-Rivera to kill Javier Soto-Alarcon,

Second Superseding IndictmentU.S. v. Victor Manuel Valle-Lassalle, et al.

Page 12

a/k/a "Chester," because [1] **VALLE-LASSALLE** suspected Soto-Alarcon of cooperating with federal authorities.

28. Counts Two through Twelve of the instant indictment are realleged and incorporated herein by reference and are also charged as overt acts in furtherance of the conspiracy.

All of the above in violation of Title 21, United States Code, Section 846.

COUNT TWO*Title 18, U.S.C., Section 924(o)***CONSPIRACY TO COMMIT FIREARMS MURDER
IN RELATION TO A DRUG TRAFFICKING OFFENSE**

Beginning on a date unknown, but no later than in or about July of 1996, to on or about July 15, 1996, in the District of Puerto Rico and within the jurisdiction of this Court,

1. **VICTOR MANUEL VALLE-LASSALLE,**
a/k/a "Manolo,"
3. **NICHOLAS PEÑA GONZALEZ,**
a/k/a "Nicky," and
4. **OMAR F. GENAO-SANCHEZ,**
a/k/a "Omi,"

the defendants herein, did knowingly, willfully, unlawfully, and intentionally combine, conspire, confederate and agree with each other to knowingly carry and use a firearm, to wit a pistol, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: conspiracy to possess with the intent to distribute controlled substances as charged in Count One of this indictment, in violation of Title 18, United States Code, Section 924(c)(1), and in the course of this violation caused the death of a person through the use of a firearm, which killing

Second Superseding IndictmentU.S. v. Victor Manuel Valle-Lassalle, et al.

Page 13

is a murder as defined in Title 18, United States Code, Section 1111, in that the defendants, while aiding and abetting each other and with malice aforethought, did unlawfully kill Carlos Roberto Rodriguez-Torres, a/k/a "Robert Caballo," by shooting him with a firearm willfully, deliberately, maliciously and with premeditation.

OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

The defendants did commit, among others, in the District of Puerto Rico, the following overt acts in furtherance of the objects and aims of the conspiracy.

1. The overt acts listed in Count One of the instant indictment are realleged and incorporated herein by reference as if set forth fully herein and are further designated as overt acts in furtherance of the conspiracy charged in Count Two of the instant indictment.

2. Counts One and Three of the instant indictment are realleged and incorporated herein by reference as if set forth fully herein and are further designated as overt acts in furtherance of the conspiracy charged in Count Two of the instant indictment.

All in violation of Title 18, United States Code, Section 924(o).

COUNT THREE*Title 18, U.S.C., Section 924(j)*

FIREARMS MURDER IN RELATION
TO A DRUG TRAFFICKING OFFENSE

On or about July 15, 1996, in the District of Puerto Rico and within the jurisdiction of this Court,

Second Superseding IndictmentU.S. v. Victor Manuel Valle-Lassalle, et al.

Page 14

1. **VICTOR MANUEL VALLE-LASSALLE,
a/k/a "Manolo,"**
3. **NICHOLAS PEÑA GONZALEZ,
a/k/a "Nicky," and**
4. **OMAR F. GENAO-SANCHEZ,
a/k/a "Omi,"**

the defendants herein, while aiding and abetting each other, did knowingly carry and use a firearm, to wit, a pistol, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: conspiracy to possess with the intent to distribute controlled substances as charged in Count One of this indictment (which Count is realleged and incorporated by reference herein), in violation of Title 18, United States Code, Section 924(c)(1), and in the course of this violation caused the death of a person through the use of a firearm, which killing is a murder as defined in Title 18, United States Code, Section 1111, in that the defendants, while aiding and abetting each other and with malice aforethought, did unlawfully kill Carlos Roberto Rodriguez-Torres, a/k/a "Robert Caballo," by shooting him with a firearm willfully, deliberately, maliciously and with premeditation. All in violation of Title 18, United States Code, Section 924(j) and Title 18, United States Code, Section 2

COUNT FOUR*Title 18, U.S.C., Section 1512(a)***MURDER OF A WITNESS OR INFORMANT**

On or about October 13, 1996, in the District of Puerto Rico and within the jurisdiction of this Court,

Second Superseding IndictmentU.S. v. Victor Manuel Valle-Lassalle, et al.

Page 15

1. **VICTOR MANUEL VALLE-LASSALLE,**
a/k/a "Manolo," and
2. **JOSE RODRIGUEZ MARRERO,**
a/k/a "Zurdo,"

the defendants herein, and Jose Hernandez-Jimenez, a/k/a "Chelo," (deceased), Heriberto Nieves-Alonzo, a/k/a "Jun," Henry Pamias-Burgos, a/k/a "Moncho Orejas," Patricio Perez-Vega, and Javier Soto-Alarcon, a/k/a "Chester," while aiding and abetting each other, did kill Edward Llaurador-Rodriguez with intent to:

- (1) prevent the attendance or testimony of any person (Edward Llaurador) in an official proceeding and
- (2) prevent the communication by any person (Edward Llaurador) to a law enforcement officer relating to the commission or possible commission of a Federal offense,

and that the killing of Edward Llaurador-Rodriguez constitutes a murder as defined in Title 18, United States Code, Section 1111, in that the defendant, **JOSE RODRIGUEZ MARRERO**, a/k/a "Zurdo," with malice aforethought, did unlawfully kill Edward Llaurador-Rodriguez, by decapitating him with a machete, willfully, deliberately, maliciously and with premeditation. All in violation of Title 18, United States Code, Section 1512(a)(1) and (a)(2) and Title 18, United States Code, Section 2.

COUNT FIVE*Title 21, U.S.C., Section 848(e)(1)*MURDER WHILE ENGAGING
IN DRUG TRAFFICKING OFFENSE

On or about October 13, 1996, in the District of Puerto Rico and within the jurisdiction of this Court,

Second Superseding IndictmentU.S. v. Victor Manuel Valle-Lassalle, et al.

Page 16

1. **VICTOR MANUEL VALLE-LASSALLE,
a/k/a "Manolo," and**
2. **JOSE RODRIGUEZ MARRERO,
a/k/a "Zurdo,"**

the defendants herein, and others, while aiding and abetting each other, while engaging in an offense punishable under Title 21, United States Code, Section 841(b)(1)(A), to wit, conspiracy to possess with intent to distribute controlled substances, as alleged in Count One of this Indictment (which Count is realleged and incorporated by reference herein), intentionally killed and counseled, commanded, induced, procured, and caused the intentional killing of Edward Llaurador-Rodriguez, and such killing resulted. All in violation of Title 21, United States Code, Section 848(e)(1) and Title 18, United States Code, Section 2.

COUNT SIX

Title 18, U.S.C., Section 1512(b)(1)
TAMPERING WITH A WITNESS

From in or about December of 1997 to in or about January of 1998, in the District of Puerto Rico and within the jurisdiction of this Court,

1. **VICTOR MANUEL VALLE-LASSALLE,
a/k/a "Manolo,"**

the defendant herein and Luis Angel Lopez-Lorenzo, a/k/a "Millo" (not charged herein), while aiding and abetting each other, did knowingly and willfully attempt to corruptly persuade another person (Javier Soto Alarcon, a/k/a "Chester"), with intent to influence, delay, or prevent the testimony of any person (Javier Soto Alarcon, a/k/a "Chester") in an official proceeding. The offenses charged

Second Superseding IndictmentU.S. v. Victor Manuel Valle-Lassalle, et al.

Page 17

herein did occur in connection with a trial of a criminal case and the "official proceeding" described herein is an official proceeding before a judge or court of the United States All in violation of Title 18, United States Code, Section 1512(b)(1) and Title 18, United States Code, Section 2.

COUNT SEVEN*Title 18, U.S.C., Section 924(j)***FIREARMS MURDER IN RELATION
TO A DRUG TRAFFICKING OFFENSE**

On or about May 20, 1993, in the District of Puerto Rico and within the jurisdiction of this Court,

11. **LUIS ROLDAN CORTES, a/k/a "Wisi," and**
12. **ANIBAL PAGAN-CEREZO, a/k/a "El Cojo,"**

the defendants herein, and Victor Manuel Valle-Lassalle, a/ka "Manolo" (not charged in this count), Raul Santodomingo Romero and David Ramos-Rivera, a/k/a "Pecas," (not charged herein), while aiding and abetting each other, did knowingly carry and use a firearm, to wit, two pistols, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: conspiracy to possess with the intent to distribute controlled substances as charged in Count One of this indictment (which Count is realleged and incorporated by reference herein), in violation of Title 18, United States Code, Section 924(c)(1), and in the course of this violation caused the death of a person through the use of a firearm, which killing is a murder as defined in Title 18, United States Code, Section 1111, in that the defendants, while aiding and abetting each other and with malice aforethought, did unlawfully kill James Martin Rodriguez, a/k/a "Kiri," by

Second Superseding IndictmentU.S. v. Victor Manuel Valle-Lassalle, et al.

Page 18

shooting him with firearms willfully, deliberately, maliciously and with premeditation. All in violation of Title 18, United States Code, Section 924(j) and Title 18, United States Code, Section 2.

COUNT EIGHT*Title 18, U.S.C., Section 1512(a)***MURDER OF A WITNESS OR INFORMANT**

On or about May 20, 1993, in the District of Puerto Rico and within the jurisdiction of this Court,

11. **LUIS ROLDAN CORTES, a/k/a "Wisi," and**
12. **ANIBAL PAGAN-CEREZO, a/k/a "El Cojo,"**

the defendants herein, and Victor Manuel Valle-Lassalle, a/k/a "Manolo" (not charged in this count), Raul Santodomingo Romero and David Ramos-Rivera, a/k/a "Pecas," while aiding and abetting each other, did kill James Martin Rodriguez, a/k/a "Kiri," with intent to:

- (1) prevent the attendance or testimony of any person (James Martin Rodriguez) in an official proceeding and
- (2) prevent the communication by any person (James Martin Rodriguez) to a law enforcement officer relating to the commission or possible commission of a Federal offense,

and that the killing of James Martin-Rodriguez constitutes a murder as defined in Title 18, United States Code, Section 1111, in that the defendant, [12] **ANIBAL PAGAN-CEREZO, a/k/a "El Cojo,"** acting upon instructions of [11] **LUIS ROLDAN CORTES, a/k/a "Wisi,"** and David Ramos-Rivera with malice aforethought, did unlawfully kill James Martin-Rodriguez by shooting

Second Superseding IndictmentU.S. v. Victor Manuel Valle-Lassalle, et al.

Page 19

him numerous times with firearms, willfully, deliberately, maliciously and with premeditation. All in violation of Title 18, United States Code, Sections 1512(a)(1) and (a)(2) and Section 2.

COUNT NINE*Title 21, U.S.C., Section 848(e)(1)***MURDER WHILE ENGAGING
IN DRUG TRAFFICKING OFFENSE**

On or about May 20, 1993, in the District of Puerto Rico and within the jurisdiction of this Court,

11. **LUIS ROLDAN CORTES, a/k/a "Wisi," and**
12. **ANIBAL PAGAN-CEREZO, a/k/a "El Cojo,"**

the defendants herein, and Victor Manuel Valle-Lassalle, a/k/a "Manolo" (not charged in this count), Raul Santodomingo Romero, David Ramos-Rivera, a/k/a "Pecas," and others, while aiding and abetting each other, and while engaging in an offense punishable under Title 21, United States Code, Section 841(b)(1)(A), to wit, conspiracy to possess with intent to distribute controlled substances, as alleged in Count One of this Indictment (which Count is realleged and incorporated by reference herein), intentionally killed and counseled, commanded, induced, procured, and caused the intentional killing of James Martin-Rodriguez, a/k/a "Kiri," and such killing resulted. All in violation of Title 21, United States Code, Section 848(e)(1) and Title 18, United States Code, Section 2.

Second Superseding Indictment
U.S. v. Victor Manuel Valle-Lassalle, et al.
Page 20

COUNT TEN
Title 18, U.S.C., Section 373
SOLICITATION OF A CRIME OF VIOLENCE

In or about January of 1998, in the District of Puerto Rico and within the jurisdiction of this Court,

1. **VICTOR MANUEL VALLE-LASSALLE, a/k/a "Manolo," and**
18. **SASHA GONZALEZ SOSA,**

the defendants herein, while aiding and abetting each other, with the intent that another person (David Ramos-Rivera, a/k/a "Pecas") engage in conduct constituting a felony that has as an element the use, attempted use, or threatened use of physical force against the person of another (Javier Soto-Alarcon, a/k/a "Chester") in violation of the laws of the United States, and under circumstances strongly corroborative of that intent, did solicit, command, induce, or otherwise endeavor to persuade such person (David Ramos-Rivera) to engage in such conduct, to wit, to commit a violation of Title 18, United States Code, Section 1512(a)(1), to wit, the killing of another person (Javier Soto-Alarcon) with the intent to prevent the attendance or testimony of any person (Javier Soto-Alarcon) in an official proceeding (which was a trial of a criminal case) and to prevent the communication by any person (Javier Soto-Alarcon) to a law enforcement officer or judge of the United States of information relating to the commission or possible commission of a Federal offense, and the crime solicited under this section is punishable by life imprisonment or death. All in violation of Title 18, United States Code, Section 373 and Section 2.

Second Superseding IndictmentU.S. v. Victor Manuel Valle-Lassalle, et al.

Page 21

COUNT ELEVEN*Title 18, U.S.C., Section 4***MISPRISION OF FELONY**

In or about January of 1998, in the District of Puerto Rico and within the jurisdiction of this Court,

[18] SASHA GONZALEZ SOSA,

the defendant herein, having knowledge of the actual commission of a felony cognizable by a court of the United States, to wit, solicitation of a crime of violence as charged in Count Ten of the instant indictment, incorporated herein by reference, did conceal and did not, as soon as possible, make known the same to some judge or other person in civil or military authority under the United States, all in violation of Title 18, United States Code, Section 4.

COUNT TWELVE*Title 21, U.S.C., Section 841(a)(1)***POSSESSION WITH INTENT TO DISTRIBUTE COCAINE**

In or about February, 1996, in the District of Puerto Rico and elsewhere and within the jurisdiction of the Court,

1. **VICTOR MANUEL VALLE-LASSALLE, a/k/a "Manolo"**
4. **OMAR F. GENAO-SANCHEZ, a/k/a "Omi,"**
13. **MARCOS MATTEI-GARCIA,**
14. **RAMON GARCIA CHERENA, a/k/a "Maya,"**
15. **ROLANDO PEREZ, a/k/a "Titi,"**

the defendants herein, aided and abetted by each other and by Walter Irizarry-Ruiz, Carlos Roberto Rodriguez-Torres, a/k/a "Robert Caballo," (deceased) and others did knowingly, willfully, unlawfully, and intentionally possess with the intent to distribute and distribute multi-kilogram

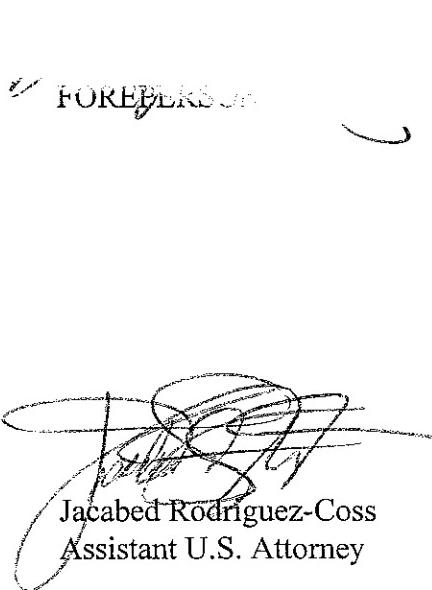
Second Superseding Indictment
U.S. v. Victor Manuel Valle-Lassalle, et al.
Page 22

quantities of cocaine in excess of five (5) kilograms of cocaine, a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

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Date: July 6, 2000.